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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Gabriela Salas and Juan Carlos Salas Flores,  
  
Plaintiffs,  
  
v.

Loren K. Miller, Director, Nebraska Service Center, U.S. Citizenship and Immigration Services, in his official capacity as well as his successors and assigns; Alejandro Mayorkas, Secretary, U.S. Department of Homeland Security, in his official capacity as well as his successors and assigns; Ur Mendoza Jaddou, Director of U.S. Citizenship and Immigration Services, in her official capacity as well as her successor and assigns; Antony J. Blinken, Secretary of State, U.S. Department of State, in his official capacity as well as his successors and assigns; Phillip Slattery, Direct National Visa Center, U.S. Department of State, in his official capacity as well as his successors and assigns; Richard C. Visek, Acting Legal Advisor, U.S. Department of State, in his official capacity as well as his successors and assigns;

Defendants.

Case No. 2:22-cv-02183-APG-EJY

**Stipulation to Extend Deadline for  
Defendants to File a Responsive  
Pleading**

**(Third Request)**

Plaintiffs, Gabriela Salas and Juan Carlos Salas Flores, and the United States of America, on behalf of Federal Defendants, through counsel, hereby stipulate and jointly move the Court to extend the time for Federal Defendants to file an answer or other

1 responsive pleading to Plaintiffs' complaint by an additional 30 days. This is the third  
2 request to extend this deadline and is based on the following:

3 1. On December 30, 2022, Plaintiffs filed their complaint (ECF No. 1).  
4 Plaintiffs request, among other relief, that the Court "[c]ompel Defendants to complete the  
5 background checks for and adjudication of Plaintiff-husband's I-601A application and  
6 scheduling of Plaintiff-husband's DS-260 immigrant visa interview." (ECF No. 1 at 12–13).

7 2. The parties previously entered into two stipulations (ECF Nos. 10, 13) to  
8 extend the deadline for Federal Defendants to answer or otherwise plead to April 3, 2023,  
9 and August 14, 2023, respectively. The Court granted the stipulations (ECF Nos. 11, 14).

10 3. Since the filing of the complaint, USCIS approved Plaintiff's I-601A  
11 application.

12 4. The agency interviewed Plaintiff on August 7, 2023, and plans to take further  
13 action. The granting of the application and upcoming agency actions may resolve some, or  
14 all, of the issues raised in Plaintiffs' complaint.

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1           5.       Accordingly, the parties request that the Court again extend the time for  
2 Federal Defendants to answer or otherwise plead by an additional 30 days. Federal  
3 Defendants responsive pleading would then be filed on or before **September 13, 2023**,  
4 which is 30 days from the current responsive deadline.

5           Respectfully submitted this 11th day of August 2023.

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7 QUIROGA LAW OFFICE, PLLC

JASON M. FRIERSON  
United States Attorney

8  
9 /s/ Maria E. Quiroga  
MARIA E. QUIROGA, ESQ.

10 *Attorney for Plaintiff*

/s/ Skyler H. Pearson  
SKYLER H. PEARSON  
Assistant United States Attorney

*Attorneys for Federal Defendants*

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13 **IT IS SO ORDERED.**

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16 **UNITED STATES MAGISTRATE JUDGE**

17 **DATED: August 11, 2023**  
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